

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

NORTH AMERICAN SOCCER LEAGUE, LLC,

Plaintiff,

v.

UNITED STATES SOCCER FEDERATION, INC. and  
MAJOR LEAGUE SOCCER L.L.C.,

Defendants.

**ORDER ON DEPOSITION**  
**DESIGNATIONS**  
17-CV-05495 (HG)

**HECTOR GONZALEZ**, United States District Judge:

The Court has reviewed the parties' deposition designations. *See* ECF No. 479. All objections set forth in the parties' deposition designations are **OVERRULED**, except that objections to the designations set forth in the table below are **SUSTAINED** in full, unless otherwise indicated. To the extent any attorney objection is included in testimony to be played to the jury, said objection shall be redacted.

<b>Witness</b>	<b>Designation</b>
Keith Bruce	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
Peter Capriotti	<ul style="list-style-type: none"> <li>• 112:23–113:1 [objection overruled except the word “denied” in line 24 must be redacted]</li> </ul>
Kathryn Carter	<ul style="list-style-type: none"> <li>• 72:6–103:4</li> </ul>
John Collins	<ul style="list-style-type: none"> <li>• 22:22–25, 23:6–8 [requires complete exchange: 22:22–23:11]</li> <li>• 229:12–13, 230:5–11 [requires complete exchange: 229:12–230:11]</li> </ul>
Robert Contiguglia	<ul style="list-style-type: none"> <li>• 72:14–73:7 [requires complete exchange: 72:13–73:7]</li> <li>• 247:4–7</li> <li>• 247:17–23</li> <li>• 247:25–248:4</li> <li>• 248:7–13</li> </ul>
Carlos Cordeiro	<ul style="list-style-type: none"> <li>• 313:19–314:2</li> <li>• 314:9–315:3</li> </ul>

	<ul style="list-style-type: none"> <li>• 316:18–317:6</li> </ul>
Luis Cuccatti	<ul style="list-style-type: none"> <li>• 100:5–10</li> <li>• 100:21–101:4</li> <li>• 117:1–4</li> <li>• 127:21–128:15</li> <li>• 130:3–13</li> <li>• 137:5–17</li> </ul>
Aaron Davidson	<ul style="list-style-type: none"> <li>• 106:22–107:4</li> <li>• 171:25–173:2</li> <li>• 174:19–176:10</li> <li>• 193:10–194:9</li> <li>• 239:9–12</li> <li>• 240:7–241:23</li> </ul>
Gregory Fike	<ul style="list-style-type: none"> <li>• 139:10–11 [requires complete exchange: 139:10–18]</li> <li>• 174:15–19</li> <li>• 185:13–186:8 [requires complete exchange: 185:13–187:1]</li> <li>• 198:21–199:17 [requires complete exchange: 198:21–199:21]</li> <li>• 215:8–215:19 [requires complete exchange: 215:8–22]</li> </ul>
Sean Flynn (Miami FC 30(b)(6))	<ul style="list-style-type: none"> <li>• 120:14–19</li> </ul>
Brian Helmick	<ul style="list-style-type: none"> <li>• 91:4–12 [requires complete exchange: 90:19–91:12]</li> <li>• 228:1–11</li> <li>• 244:11–14, 245:4–10 [requires complete exchange: 244:11–245:14]</li> <li>• 253:7–17</li> <li>• 257:1–4</li> <li>• 270:20–24</li> <li>• 299:18–300:21</li> </ul>
Clark Hunt	<ul style="list-style-type: none"> <li>• 39:13–40:15 [calls for speculation]</li> </ul>
Kevin Kletz (Cosmos (30(b)(6)))	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
John Koskinen	<ul style="list-style-type: none"> <li>• 241:15–22</li> <li>• 243:6–10</li> <li>• 251:20–252:8</li> </ul>
Lisa Levine	<ul style="list-style-type: none"> <li>• 146:20–22 [requires complete exchange: 146:20–25]</li> </ul>
Neal R. Malone	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
Richard Moeller	<ul style="list-style-type: none"> <li>• 169:16–170:4</li> <li>• 170:22–171:3</li> <li>• 260:10–15</li> </ul>
Robert Palmer	<ul style="list-style-type: none"> <li>• 42:22–43:9</li> </ul>

	<ul style="list-style-type: none"> <li>• 74:12–75:1 [requires complete exchange: 74:12–75:5]</li> </ul>
Alec Papadakis	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
Bill Peterson	<ul style="list-style-type: none"> <li>• 94:20–95:11</li> <li>• 126:12 [exclude error]</li> </ul>
Timothy Pinto	<ul style="list-style-type: none"> <li>• 186:19–22 [requires complete exchange: 186:19–187:16]</li> </ul>
Alan Rothenberg	<ul style="list-style-type: none"> <li>• 54:5–6 [requires complete exchange: 54:5–13]</li> <li>• 140:20–22 [requires complete exchange: 140:18–22]</li> </ul>
Donna Shalala	<ul style="list-style-type: none"> <li>• 68:4–18 [requires complete exchange: 68:4–23]</li> <li>• 69:23–70:2 [requires complete exchange: 69:23–70:2]</li> </ul>
Mark Stephan	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
Steven A. Wagoner	<ul style="list-style-type: none"> <li>• 211:5–10 [requires complete exchange: 210:17–211:10]</li> </ul>
Robert J. Watkins	<ul style="list-style-type: none"> <li>• 84:11–85:24</li> <li>• 85:6–25</li> <li>• 87:5–15</li> <li>• 197:17–23</li> </ul>

SO ORDERED.

/s/ Hector Gonzalez  
 HECTOR GONZALEZ  
 United States District Judge

Dated: Brooklyn, New York  
 December 26, 2024